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Plan, Jacqueline Green Rollover Account, and Wayne D.
Green Rollover Account*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

Adv. Pro. No. 08-01789 (BRL)

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**NOTICE OF CUSTOMERS' MOTION FOR
MANDATORY WITHDRAWAL OF THE REFERENCE**

TO THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

PLEASE TAKE NOTICE that J.X. Reynolds & Co. Deferred Profit Sharing Plan, Jacqueline Green Rollover Account, and Wayne D. Green Rollover Account (the “Customers”), respectfully move the United States District Court for the Southern District of New York for entry of an order, pursuant to 28 U.S.C. § 157(d), Federal Rule of Bankruptcy Procedure 5011, and Rule 5011-1 of the Local Rules of the Bankruptcy Court, withdrawing the reference with respect to the Trustee’s motion (the “Motion”) seeking an order holding that the Customers are not “customers” under the Securities Investor Protection Act (“SIPA”) entitled to insurance from the Securities Investor Protection Corporation (“SIPC”) for the reasons set forth in the accompanying Memorandum of Law and Declarations of James Reynolds, Wayne D. Green, and Jacqueline Green, and exhibits thereto, which are hereby incorporated by reference.

The Customers have made no prior request to this Court or to any other court for the relief requested by this motion.

WHEREFORE, the Customers respectfully request that the Court enter an order granting the relief requested herein, and such other and further relief as the Court deems just and appropriate.

Dated: January 17, 2012
New York, New York

BECKER & POLIAKOFF LLP

By: /s/ Helen Davis Chaitman
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